FILED

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

2017 FEB 23 P 4:04

CLERK US DISTRICT COURT

Tristan di Montenegro

Plaintiff(s)
(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Federal Bureau of Investigation

Defendant(s)
(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. 1:17-cv-212 (TSE/MSN)
(to be filled in by the Clerk's Office)

Jury Trial: *(check one)* ☐ Yes ☑ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Tristan di Montenegro
Street Address	9501 Burke Road - Number 10552
City and County	Burke
State and Zip Code	Virginia 22009-0552
Telephone Number	202-909-3370
E-mail Address	tristandimontenegro@hotmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name	Federal Bureau of Investigation
Job or Title *(if known)*	General Counsel
Street Address	935 Pennsylvania Avenue NW - Room 7427
City and County	Washington
State and Zip Code	District of Columbia 20535-0001
Telephone Number	202-324-3000
E-mail Address *(if known)*	

Defendant No. 2

Name	
Job or Title *(if known)*	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address *(if known)*	

Defendant No. 3

Name	
Job or Title *(if known)*	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address *(if known)*	

Defendant No. 4

Name	
Job or Title *(if known)*	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address *(if known)*	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than $75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☑ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1) Freedom of Information Act, 5 U.S.C. subsection 552 and;

2) Privacy Act, 5 U.S.C. section 552(a),

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* ____________________, is a citizen of the State of *(name)* ____________________.

b. If the plaintiff is a corporation

The plaintiff, *(name)* ____________________, is incorporated under the laws of the State of *(name)* ____________________, and has its principal place of business in the State of *(name)* ____________________.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* ____________________, is a citizen of the State of *(name)* ____________________. Or is a citizen of *(foreign nation)* ____________________.

b. If the defendant is a corporation

The defendant, *(name)* ____________________, is incorporated under the laws of the State of *(name)* ____________________, and has its principal place of business in the State of *(name)* ____________________. Or is incorporated under the laws of *(foreign nation)* ____________________, and has its principal place of business in *(name)* ____________________.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than $75,000, not counting interest and costs of court, because *(explain)*:

Not Applicable

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiffs rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attachment 1

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See Attachment 2

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 2-23-2017

Signature of Plaintiff: T. Montenegro

Printed Name of Plaintiff: Tristan di Montenegro

B. For Attorneys

Date of signing: ________

Signature of Attorney: ________

Printed Name of Attorney: ________

Bar Number: ________

Name of Law Firm: ________

Street Address: ________

State and Zip Code: ________

Telephone Number: ________

E-mail Address: ________

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

Tristan di Montenegro
Plaintiff,

v. Civil Action No. 1:17-cv-212

Federal Bureau of Investigation
Defendant,

CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of this document.

Tristan di Montenegro
Name of *Pro Se* Party

Signature of *Pro Se* Party

Executed on: February 22, 2017